

---

**From:** [Conlee Whiteley](#)  
**To:** [Lockard, Victoria D. \(Shld-Atl-LT\)](#)  
**Cc:** [rgeman@lchb.com](#); [mpatronella@classlawdc.com](#); [nmigliaccio@classlawdc.com](#); [kmadiraju@lchb.com](#); [valpec@kirtlandpackard.com](#); [David J. Stanoch](#); [DECValsartan@btlaw.com](#); [Layne Hilton](#)  
**Subject:** [EXTERNAL]RE: Deposition date for Dr. Kaplan - Med Mon  
**Date:** Monday, December 13, 2021 10:21:48 AM

---

Good Morning Victoria,

We have not held following days for the experts as no more than 7 hours will be needed for any of the experts and much less for those who have offered limited opinions. I can also update that the Panagos deposition will be in Miami. We are working to confirm all remaining dates and locations.

Thanks, Conlee

Conlee S. Whiteley  
Kanner & Whiteley, L.L.C.  
701 Camp Street  
New Orleans, LA 70130  
(504) 524-5777 voice  
(504) 524-5763 fax  
[www.kanner-law.com](http://www.kanner-law.com)

---

THIS EMAIL MESSAGE IS FOR THE SOLE USE OF THE INTENDED RECIPIENT(S) AND MAY CONTAIN CONFIDENTIAL AND PRIVILEGED INFORMATION. IF YOU ARE NOT THE INTENDED RECIPIENT, PLEASE CONTACT THE SENDER BY REPLY EMAIL AND DESTROY ALL COPIES OF THE ORIGINAL MESSAGE.

---

---

**From:** lockardv@gtlaw.com <lockardv@gtlaw.com>  
**Sent:** Friday, December 10, 2021 11:35 AM  
**To:** Layne Hilton <l.hilton@kanner-law.com>; DECValsartan@btlaw.com  
**Cc:** rgeman@lchb.com; mpatronella@classlawdc.com; nmigliaccio@classlawdc.com; kmadiraju@lchb.com; valpec@kirtlandpackard.com; David J. Stanoch <d.stanoch@kanner-law.com>  
**Subject:** RE: Deposition date for Dr. Kaplan - Med Mon

We can set January 19<sup>th</sup> for Kaplan. Do you have dates for Conti?

Also can you confirm all the experts are holding the following day in case we need it?

Can you also confirm location for all?

**Victoria Davis Lockard**

Shareholder

Greenberg Traurig, LLP | 3333 Piedmont Road NE | Suite 2500 | Atlanta, GA 30305

Tel 678.553.2103 | Fax 678.553.2104

[lockardv@gtlaw.com](mailto:lockardv@gtlaw.com) | [www.gtlaw.com](http://www.gtlaw.com)



---

**From:** Layne Hilton <[l.hilton@kanner-law.com](mailto:l.hilton@kanner-law.com)>

**Sent:** Monday, December 6, 2021 3:01 PM

**To:** 'DECValsartan@btlaw.com' <[DECValsartan@btlaw.com](mailto:DECValsartan@btlaw.com)>

**Cc:** [rgeman@lchb.com](mailto:rgeman@lchb.com); Mark Patronella <[mpatronella@classlawdc.com](mailto:mpatronella@classlawdc.com)>; [nmigliaccio@classlawdc.com](mailto:nmigliaccio@classlawdc.com); [kmadiraju@lchb.com](mailto:kmadiraju@lchb.com); [valpec@kirtlandpackard.com](mailto:valpec@kirtlandpackard.com); David J. Stanoch <[d.stanoch@kanner-law.com](mailto:d.stanoch@kanner-law.com)>

**Subject:** [EXTERNAL]Deposition date for Dr. Kaplan - Med Mon

**\*EXTERNAL TO GT\***

Counsel:

We can provide either January 19<sup>th</sup> or February 2<sup>nd</sup> for Dr. Kaplan's deposition. Please let me know whether either of these dates works for Defendants.

Thanks,

Layne

Layne Hilton  
Kanner & Whiteley, L.L.C.  
701 Camp Street  
New Orleans, LA 70130  
(504) 524-5777 voice  
(504) 524-5763 fax  
[www.kanner-law.com](http://www.kanner-law.com)

---

THIS EMAIL MESSAGE IS FOR THE SOLE USE OF THE INTENDED  
RECIPIENT(S) AND MAY CONTAIN CONFIDENTIAL AND PRIVILEGED  
INFORMATION. IF YOU ARE NOT THE INTENDED RECIPIENT,  
PLEASE CONTACT THE SENDER BY REPLY EMAIL AND DESTROY  
ALL COPIES OF THE ORIGINAL MESSAGE.

---

## Disclaimer

The information contained in this communication from the sender is confidential. It is intended solely for use by the recipient and others authorized to receive it. If you are not the recipient, you are hereby notified that any disclosure, copying, distribution or taking action in relation of the contents of this information is strictly prohibited and may be unlawful.

This email has been scanned for viruses and malware, and may have been automatically archived by **Mimecast Ltd**, an innovator in Software as a Service (SaaS) for business. Providing a **safer** and **more useful** place for your human generated data. Specializing in; Security, archiving and compliance. To find out more [Click Here](#).

CONFIDENTIALITY NOTICE: This email and any attachments are for the exclusive and confidential use of the intended recipient. If you are not the intended recipient, please do not read, distribute or take action in reliance upon this message. If you have received this in error, please notify us immediately by return email and promptly delete this message and its attachments from your computer system. We do not waive attorney-client or work product privilege by the transmission of this message.

---

If you are not an intended recipient of confidential and privileged information in this email, please delete it, notify us immediately at [postmaster@gtlaw.com](mailto:postmaster@gtlaw.com), and do not use or disseminate the information.

CONFIDENTIALITY NOTICE: This email and any attachments are for the exclusive and confidential use of the intended recipient. If you are not the intended recipient, please do not read, distribute or take action in reliance upon this message. If you have received this in error, please notify us immediately by return email and promptly delete this message and its attachments from your computer system. We do not waive attorney-client or work product privilege by the transmission of this message.